

**In The Matter Of:**  
*Lauren Roberts, et al. v.*  
*Trop, Inc., D/B/A Pink Pony, et al.*

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*Teri Gale Galardi*  
*March 29, 2017*

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*American Court Reporting Company, Inc.*  
*52 Executive Park South*  
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LAUREN ROBERTS, LATISHA BLAKE, ASHLEY BULLOCK, ASHLEY GIORDANO, THERESA GIKAS, and ANGELICA ANDREWS,	1 CONTENTS
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vs.	3 Examination by Mr. Dudley 4
TROP, INC., D/B/A PINK PONY, and TERRI GALARDI,	4 Examination by Mr. Fuchs 101
Respondents.	5 E X H I B I T S
LATOYA BECTON, LATISHA BLAKE, RODRINNA BROOKS, COURTNEY HADLEY, SHELDON HAILEY, BRIANNA MATHIS, SASHA OMOGIATE, MIKKI WILLIAMS, and BRIANNA WIGGINS,	6 No exhibits were marked for identification.
Claimants,	7
vs.	8
COUNTRY CLUB, INC., D/B/A GOLDRUSH, AND ) Arbitrator: TERRI GALARDI, )	9
Respondents. ) George Reid	10
- - -	11
The deposition of TERI GALE GALARDI, taken	12
on behalf of the Claimants, taken pursuant to the	13
stipulations contained herein, the reading and signing	14
of the deposition being reserved; taken before Audrey	15
Michelle Ling, Certified Court Reporter and Notary	16
Public, commencing at 10:24 a.m., on this the 29th day	17
of March 2017, at 2600 Peachtree Street, Suite 2700,	18
Atlanta, Georgia.	19
	20
	21
	22
	23
	24
	25
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1 APPEARANCES OF COUNSEL:	1 PROCEEDINGS
2 For the Claimants:	2 MR. DUDLEY: This is the deposition of
3 AINSWORTH G. DUDLEY	3 Teri Galardi, to be used in two arbitration
4 Attorney at Law	4 cases: Lauren Roberts, et al., versus TROP,
5 Dudley LLC	5 Inc., et al.; and Latoya Becton, et al., versus
6 Building One, Suite 200	6 Country Club, Inc., et al.
7 4200 Northside Parkway	7 Swear in the witness, please.
8 Atlanta, Georgia 30327	8 TERI GALE GALARDI,
9 Tel: (404) 687-8205	9 was called as a witness and, having first been
10 Fax: (404) 237-2150	10 duly sworn, was examined and testified as
11 E-Mail: Dudleylaw@imnisp.com	11 follows:
12 MICHAEL LEE CHAPMAN	12 EXAMINATION
13 Attorney at Law	13 BY MR. DUDLEY:
14 Michael L. Chapman, P.C.	14 Q Could you state your full name, please.
15 4200 Northside Parkway	15 A Teri Gale Galardi.
16 Building One, Suite 200	16 Q Ms. Galardi, is your first name spelled
17 Atlanta, Georgia 30327	17 T-E-R-R-I or one R?
18 Tel: (404) 734-8510	18 A One R.
19 Fax: (404) 237-2150	19 Q One R. Okay. My name is Ainsworth Dudley.
20 E-Mail: Mchapman@chapmanfirm.com	20 I'm here with Mike Chapman, who's sitting to my right.
21 For the Respondents:	21 We represent a number of former adult entertainers at
22 DEAN RICHARD FUCHS	22 Goldrush and Pink Pony. We're here to ask you some
23 Attorney at Law	23 questions about those two cases. You're under oath.
24 Schulten Ward Turner & Weiss, LLP	24 I think you've given depositions before, so you
25 260 Peachtree Street NW	25 certainly understand what you're doing here today;
Suite 2700	
Atlanta, Georgia 30303	
Tel: (404) 688-8277	
Fax: (404) 688-6840	
E-Mail: D.fuchs@swtwlaw.com	
Also Present:	
Dennis Williams	

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1 right?  
2 A Right.  
3 Q How many depositions have you given for an  
4 adult entertainment club?  
5 A I think, two.  
6 Q Two. And what cases were those?  
7 A I don't remember.  
8 Q Can you tell me what clubs were involved?  
9 A It was in Florida.  
10 Q Okay. Was one of them the Geter case?  
11 A Yeah.  
12 Q Fly Low?  
13 A I think so. Mm-hm (affirmative).  
14 Q And the other one you can't recall what club  
15 was involved?  
16 A The other one was Pink Pony Doral.  
17 Q That's another Florida --  
18 A Right.  
19 Q -- case? Okay. Can you tell me what you do  
20 for a living.  
21 A Well, I am the owner, CEO, of adult  
22 entertainment establishments that I inherited from my  
23 father. I also have a small bar of my own in Fort  
24 Lauderdale that I had before my father passed away.  
25 Q When did your father pass away?

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1 A December 1st, 2012.  
2 Q And is it a fair statement to say that your  
3 father owned a number of adult entertainment clubs  
4 around the country?  
5 A Yes.  
6 Q And you inherited his interest in those  
7 clubs?  
8 A Yes.  
9 Q Let me ask you a few questions before that.  
10 You had a nightclub in Florida? Is that what you  
11 said?  
12 A A bar, a small bar.  
13 Q A bar. Okay. And that's not an adult  
14 entertainment club; right?  
15 A No.  
16 Q Okay. And in that club, you sold food or  
17 just alcohol?  
18 A We serve just bar food. We have a very  
19 small kitchen.  
20 Q And you have waitresses and bar staff?  
21 A No.  
22 Q Those sorts of employees?  
23 A We have bartenders.  
24 Q Okay. No waitresses?  
25 A No waitresses.

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1 Q How many years did you run that club or bar?  
2 A I still have that club.  
3 Q When did you start it?  
4 A I believe I bought it in '08 or '9.  
5 Q And you had owned some bars before that time  
6 too; right?  
7 A The Backdoor Lounge in Las Vegas.  
8 Q Okay. Did you utilize a tip credit system  
9 for your employees at those bars?  
10 A Nevada doesn't have that.  
11 Q Is it your understanding that the federal  
12 law has a tip credit provision?  
13 MR. FUCHS: Objection to form. If you  
14 know, you can answer.  
15 THE WITNESS: All I can tell you is  
16 Nevada pays full minimum wage. So I'm not -- I'm  
17 not, you know -- I'm not used to the tip credit.  
18 BY MR. DUDLEY:  
19 Q Okay. So your staff in Nevada, they're paid  
20 the minimum wage --  
21 A That's right.  
22 Q -- under either state or federal law. And  
23 you do not utilize the tip credit.  
24 MR. FUCHS: Objection to form. If you  
25 know, you can answer.

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1 THE WITNESS: Not that I know of.  
2 BY MR. DUDLEY:  
3 Q Okay. What about in Florida?  
4 A In Florida, I don't know if they use it or  
5 not.  
6 Q But you understand the basic obligation,  
7 from running these bars, that you have to pay the  
8 minimum wage to your employees; correct?  
9 A I understand there's a tip wage here.  
10 Q But you understand that, regardless of  
11 whether there's a tip wage or not, you're required to  
12 pay the minimum wage to your employees; correct?  
13 Anywhere.  
14 A Right.  
15 Q All right. So you inherited your father's  
16 interest in a number of nightclubs after he passed  
17 away in December of 2012. One of those nightclubs was  
18 the Pink Pony in Atlanta; is that correct?  
19 A Right.  
20 Q And the Pink Pony is operated by TROP, Inc.;  
21 is that correct?  
22 A TROP, Inc.  
23 Q TROP, Inc.? What does TROP stand for?  
24 A My father named corporations different  
25 things for different reasons. I have no idea.

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1 Q Okay. And are you the hundred percent owner  
2 of TROP, Inc.?  
3 A Yes.  
4 Q Are you on the board of directors of TROP,  
5 Inc.?  
6 A Yes.  
7 Q Are you an officer?  
8 A Yes.  
9 Q What position do you have?  
10 A President.  
11 Q Have you always been president since you  
12 inherited your interest?  
13 A Yes.  
14 Q Do you hold any other offices?  
15 A I don't know.  
16 Q You don't know whether you're a --  
17 A No, I don't.  
18 Q -- treasurer --  
19 A I don't know.  
20 Q -- secretary, vice president? Are you an  
21 employee of TROP, Inc., or TROP, Inc.? If I  
22 mispronounce it, I apologize.  
23 A Do I receive a paycheck from TROP, Inc.?  
24 Q Are you an employee?  
25 A I receive a paycheck from TROP, Inc.

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1 Q And what do you understand you receive that  
2 paycheck for?  
3 A Because I own it.  
4 Q Are you rendering services to TROP, Inc.,  
5 also?  
6 A I go to the office. I check my e-mail.  
7 Q Where is the office?  
8 A It's at 2555 Chantilly Drive Northeast.  
9 Q Do you run TROP, Inc.?  
10 A No.  
11 Q Do you manage it?  
12 A No.  
13 Q Who does?  
14 A I have Dennis Williams, Mike Kap, and  
15 various managers that are in the club.  
16 Q Can you tell me what Dennis Williams does  
17 for TROP, Inc.?  
18 A He's the CFO.  
19 Q What does he do as CFO?  
20 A He takes care of all the licensing and  
21 different -- not really operations of the club, but he  
22 also has restaurant -- he has restaurants in the club.  
23 Q What do you mean, he has restaurants? He  
24 runs the restaurant?  
25 A Right. No. He has the restaurants in the

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1 club.  
2 Q Tell me what you mean by that. Do you -- is  
3 that --  
4 A I mean --  
5 Q Does he have his own company?  
6 A -- operate. Yes.  
7 Q He has his own company at Pink Pony that  
8 operates a restaurant?  
9 A Yes.  
10 Q What's the name of that company?  
11 A I don't know.  
12 Q What else does he do at Pink Pony?  
13 A At Pink Pony? That's all.  
14 Q Or for TROP.  
15 A That's all.  
16 Q What does Mike Kap do for TROP?  
17 A Mike Kap is the operations manager. He  
18 visits the club.  
19 Q What are his responsibilities as operations  
20 manager?  
21 A Operations.  
22 Q Well, tell me what that means to you. It  
23 may not mean the same thing to you that it means to  
24 me, so --  
25 A I don't -- I don't even -- I don't get

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1 involved in what he does in the clubs. I don't know.  
2 Q Well --  
3 A I know he visits the clubs.  
4 Q Does he hire staff?  
5 A I don't know.  
6 Q You don't know anything Mike Kap does. You  
7 call him operations manager, but you don't know  
8 anything he does.  
9 A He may hire managers, and then managers hire  
10 other people. I don't know. I know he visits clubs.  
11 Q Who makes the financial decisions?  
12 MR. FUCHS: Objection to form. If you  
13 understand what that question means, you can  
14 answer.  
15 THE WITNESS: Well, I don't know what  
16 financial -- what financial decisions you're  
17 talking about.  
18 BY MR. DUDLEY:  
19 Q Well, you've run several bars; right?  
20 A Right.  
21 Q You've owned them, and you've run them;  
22 right?  
23 A Right.  
24 Q So you know what it takes to run a bar or a  
25 club?

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1 A Right.  
2 Q You know the type of decisions, financial  
3 and otherwise, that need to be made at these types of  
4 places.  
5 A I don't know what kind of financial  
6 decisions you're talking about.  
7 Q Well, I'm asking you. I don't either.  
8 A Can you be more specific?  
9 Q You're the one --  
10 A You're asking me the question. Can you be  
11 more specific?  
12 Q I'm asking you a very simple question. And  
13 that is: What does Mike Kap do as operations manager?  
14 A He doesn't make the financial decisions. We  
15 have a chief financial officer who handles some of the  
16 financial systems. And we have a chief operations  
17 manager -- officer who does that, and that's Mike Kap,  
18 operations.  
19 Q Who does the -- who is the chief financial  
20 officer? Mr. Williams?  
21 A Yes.  
22 Q And you're saying he handles the financial  
23 affairs?  
24 A Yes.  
25 Q Okay. I mean, that would make sense if he's

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1 chief financial officer, would it not?  
2 A Mm-hm (affirmative).  
3 Q Now, do you know who's under Mike Kap as  
4 operations manager of TROP, Inc.? Is there a shift  
5 manager or a club manager?  
6 A There is. There -- but I don't really -- I  
7 mean, I know some of their first names, but --  
8 Q So you don't know the names of -- well,  
9 strike that.  
10 Is there a manager under Mike Kap that runs  
11 Pink Pony?  
12 A You know, I think -- I don't even want to  
13 say "I think." But there are shift managers under  
14 Mike Kap.  
15 Q So you believe that there is a -- there is a  
16 night shift manager and a day shift manager?  
17 A Right.  
18 Q And do you know their first names?  
19 A Yes.  
20 Q What are those names?  
21 A Jeff.  
22 Q He's which one?  
23 A Daytime.  
24 Q Day. Who's night?  
25 A Eddie.

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1 Q Is it your understanding that Mike hires  
2 entertainers or --  
3 A No. I don't know who hires them.  
4 Q You don't know. You don't know whether it's  
5 Mike --  
6 A It's not.  
7 Q -- the night manager or the day shift  
8 manager?  
9 A It's not Mike. It would be the managers.  
10 Q Do you also have an interest in Country  
11 Club, Inc., in Georgia?  
12 A Yes.  
13 Q That is a Georgia corporation?  
14 A I don't know.  
15 Q That is, again, an interest that you  
16 inherited --  
17 A Right.  
18 Q -- from your father when he passed away in  
19 December of 2012 --  
20 A Yes.  
21 Q -- correct? Country Club, Inc., owns  
22 Goldrush; is that correct?  
23 A Yes.  
24 Q You're a hundred percent owner of Country  
25 Club, Inc.?

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1 A Yes.  
2 Q You are a director?  
3 A I'm president.  
4 Q Are you a director?  
5 A I don't know.  
6 Q Well, you knew it for Pink Pony. Is there  
7 any reason why you don't know who the board of  
8 directors are for Country Club, Inc.?  
9 A I don't really know TROP, Inc., if it's -- I  
10 just know I'm president.  
11 Q So you do not know who the directors are of  
12 Country Club, Inc.?  
13 A No. I'd have to look at the corporate --  
14 I'm the president. I imagine I'd be a director as  
15 well. I don't look at those documents very often.  
16 Q Who keeps up with that stuff?  
17 A Dennis Williams and my secretary, Kelly.  
18 Q Are you treasurer, secretary, any other  
19 officer --  
20 A I don't know.  
21 Q -- of Country Club, Inc.?  
22 A I don't know.  
23 Q Do you know who any of the other officers  
24 are?  
25 A No.

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1 Q Are you an employee of Country Club, Inc.?  
2 A No.  
3 Q Do you receive a salary?  
4 A No.  
5 Q Is there a particular reason why you do not  
6 receive a salary there, but you do receive one at Pink  
7 Pony?  
8 A Well, probably because that club doesn't  
9 make a lot of money. It would hurt the club.  
10 Q Tell me what you do as president at Country  
11 Club, Inc.  
12 A Nothing. Nothing, really.  
13 Q You have no responsibilities?  
14 A Not really.  
15 Q Is it a fair statement to say that you have  
16 the ultimate decision-making authority when it comes  
17 to Goldrush?  
18 A It would depend on the decision.  
19 Q Well, tell me the types of decisions that  
20 you would have ultimate authority on.  
21 A To sell it or not to sell it.  
22 Q Is that it?  
23 A That's it.  
24 Q I'm not asking you whether you -- whether  
25 you exercise authority. I'm asking whether you have

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1 it. You're a hundred percent owner. You're the  
2 president.  
3 A I don't involve myself with any operations  
4 in any club.  
5 Q Do you have the authority to make any  
6 decision? Let me rephrase that.  
7 Do you have the authority to make every  
8 decision for Country Club, Inc., if you so choose to?  
9 A That's not something I would do.  
10 Q I'm not asking you that.  
11 A I understand what you're asking me. But  
12 you're asking me to tell you something that I wouldn't  
13 do.  
14 Q Okay. Well, what I'm asking you is whether  
15 you have the power to do that, not whether you would  
16 do it.  
17 A As owner, I would have the power. But it's  
18 not something that I would do. I don't know -- I  
19 don't deal with those businesses. I don't know about  
20 those businesses. So I would not go around throwing  
21 my authority around in those businesses. I would only  
22 make the decision of whether to sell it or not.  
23 Q Who do you let make the other decisions for  
24 Country Club, Inc.?  
25 A Mike Kap.

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1 Q Who else?  
2 A Dennis Williams.  
3 Q And is Mike the operations manager at  
4 Country Club, Inc.?  
5 A Yes.  
6 Q Does he have any other responsibilities?  
7 A No.  
8 Q And Mr. Williams is the financial officer?  
9 A Right.  
10 Q Does he have any other responsibilities at  
11 Country Club, Inc.?  
12 A No.  
13 Q Do you have an interest in a company called  
14 Pony Tail, Inc.?  
15 MR. FUCHS: I'm going to object to the  
16 form of the question. This case does not involve  
17 Pony Tail, Inc. So I'm going to give you a  
18 little bit of latitude here. But if you stray  
19 too far, I'm going -- I'm going to instruct the  
20 witness not to answer.  
21 You can answer that question.  
22 MR. DUDLEY: Well, you can object to  
23 the form of the question. But, otherwise, I  
24 think it's an inappropriate objection, but --  
25 MR. FUCHS: That's fine.

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1 BY MR. DUDLEY:  
2 Q Do you have an interest in Pony Tail, Inc.?  
3 A I don't know, honestly. I don't know if I'm  
4 on as a -- as a president or not. I don't know.  
5 Q Do you own Pony Tail, Inc.?  
6 A I own Pony Tail, Inc.  
7 Q A hundred percent of it?  
8 A Yes.  
9 Q And you're a director at Pony Tail, Inc.?  
10 A I don't know.  
11 Q You don't know if you're a director?  
12 A No.  
13 Q Can you think of any reason why you would be  
14 treated differently at Pony Tail, Inc., than you are  
15 at TROP, Inc., or --  
16 A I don't go --  
17 Q -- Country Club --  
18 A I don't go into the clubs, so it wouldn't  
19 treat me any kind of way.  
20 Q You're a president of Pony Tail, Inc.?  
21 A I believe so.  
22 Q Are you an employee?  
23 MR. FUCHS: Okay. I'm going to place  
24 an objection on the record. Ainsworth, I need to  
25 understand, before we continue down this path,

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1 why you are asking Ms. Galardi about entities  
2 that are not involved or affiliated with this --  
3 the claims that you've asserted.  
4 MR. DUDLEY: It's my deposition.  
5 MR. FUCHS: Yes. That's correct. But  
6 if you can't answer my question, I'm going to  
7 tell her not to answer.  
8 MR. DUDLEY: Okay. Well, I'm certainly  
9 entitled, in a deposition, to get into what her  
10 relationship is in Pony Tail, Inc.  
11 MR. FUCHS: Because?  
12 MR. DUDLEY: Because they have been  
13 sued in the exact same type of case we've been  
14 sued here -- that's present here. And I'm going  
15 to get into that today, unless you instruct her  
16 not to answer it.  
17 MR. FUCHS: Well, that's what's coming.  
18 MR. DUDLEY: Well, that's fine. I'm  
19 not going to spend a lot of time on this, but I  
20 need to understand her basic relationship with  
21 Pony Tail, Inc.  
22 MR. FUCHS: And she's told you.  
23 BY MR. DUDLEY:  
24 Q So you are -- you don't know whether you're  
25 a director, you own a hundred percent of it, and

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1 you're the president; is that correct?  
2 A That's correct.  
3 Q And are you an employee?  
4 A No.  
5 Q Do you own a company called Country Club,  
6 Inc., in South Carolina?  
7 MR. FUCHS: I'm going to object. I'm  
8 going to object. You're getting too far afield  
9 of this case. I'm going to instruct Ms. Galardi  
10 not to answer the question.  
11 BY MR. DUDLEY:  
12 Q All right. Are you a director of Country  
13 Club, Inc.?  
14 MR. FUCHS: Which one are we talking  
15 about now?  
16 MR. DUDLEY: Same one.  
17 MR. FUCHS: South Carolina?  
18 MR. DUDLEY: Yeah.  
19 MR. FUCHS: Don't answer that question.  
20 BY MR. DUDLEY:  
21 Q Are you an officer of Country Club, Inc.?  
22 MR. FUCHS: I direct you not to answer  
23 that question.  
24 BY MR. DUDLEY:  
25 Q Are you an employee of Country Club, Inc.,

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1 South Carolina?  
2 MR. FUCHS: Same objection. When you  
3 decide you want to ask questions about --  
4 MR. DUDLEY: Dean, I'm going to ask  
5 questions. If you want to object, all I can do  
6 is -- if you want to instruct her not to answer  
7 it, that's your right. We'll deal with it later.  
8 MR. FUCHS: That's fine. And I'm just  
9 telling you that I'm going to direct her not to  
10 answer. But if you've got questions about the  
11 clubs that are at issue in this case, the  
12 companies that are at issue, that's fine.  
13 MR. DUDLEY: Depositions are not  
14 limited to what you would like to testify to.  
15 You know, we have taken the claimants'  
16 depositions in this case, and you have had wide  
17 latitude, asking them about where they've worked,  
18 things like that. It's the same situation here.  
19 If you want to instruct her not, we'll take it up  
20 with George.  
21 MR. FUCHS: That's fine.  
22 BY MR. DUDLEY:  
23 Q Do you have an interest in any other adult  
24 entertainment clubs other than the ones we've just  
25 talked about?

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1 MR. FUCHS: You can answer.  
2 THE WITNESS: I do.  
3 BY MR. DUDLEY:  
4 Q Which ones?  
5 THE WITNESS: Do you want me to answer  
6 that?  
7 MR. FUCHS: Yes, you can answer.  
8 That's okay.  
9 THE WITNESS: Can you be more specific?  
10 BY MR. DUDLEY:  
11 Q Do you -- you know what an adult  
12 entertainment club is?  
13 A I do know what an adult entertainment club  
14 is.  
15 Q Okay. Do you have an interest in one?  
16 A In Georgia?  
17 Q Other than the ones you've talked about.  
18 A In Georgia?  
19 Q Anywhere. Anywhere in the world.  
20 A Cheetahs Las Vegas, Pink Pony Doral. You  
21 just want the adult entertainment?  
22 Q Yes.  
23 A Onyx.  
24 Q Is there an Onyx other than the Pony Tail,  
25 Inc., one?

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1 A No.  
2 Q Okay.  
3 A Masters South Carolina.  
4 Q That's Country Club, Inc., South Carolina?  
5 A Correct.  
6 Q All right. What else?  
7 A That's it, I think, for adult entertainment.  
8 Q Those are the ones you have a current  
9 interest in?  
10 A Correct.  
11 Q Are there ones that you inherited from your  
12 father --  
13 A Those, I inherited.  
14 Q I understand that. Let me ask my question.  
15 Are there other clubs that you inherited  
16 from your father that you no longer have an interest  
17 in?  
18 A That I've sold?  
19 Q That would be one way of divesting your  
20 interest.  
21 A I have sold.  
22 Q Which ones have you sold?  
23 A I sold King of Diamonds in Miami. I sold  
24 Pink Pony in Pompano. And I think -- I think that's  
25 it.

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1 Q These are clubs that -- well, strike that.  
2 When did you sell King of Diamonds in Miami?  
3 A 2013, I believe. No. 2014, I think.  
4 Q 2014?  
5 A I think so.  
6 Q All right. When did you sell the Pink Pony  
7 in Pompano?  
8 A 2016.  
9 Q Without getting into the ones you still  
10 own -- the Cheetah Las Vegas, Pink Pony Doral -- is it  
11 safe to say that you have a similar type arrangement  
12 with those companies that you have with Country Club,  
13 Inc., of Georgia and TROP, Inc., here, so far as being  
14 an owner, hundred percent owner, possibly a director  
15 and officer?  
16 A Yes. Yes.  
17 Q And is that the same --  
18 A I don't think I'm an officer in Doral, but I  
19 own it.  
20 Q And the ones you sold, KOD in Miami and Pink  
21 Pony in Pompano, you were a hundred percent owner of  
22 those and possibly an officer -- I'm sorry -- possibly  
23 a director and an officer of those; correct?  
24 A Correct.  
25 Q When you inherited your interest in these

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1 adult entertainment clubs we've been talking about,  
2 there was a wage and hour case that had been filed  
3 against Onyx; correct?  
4 A Correct.  
5 Q All right. And you were --  
6 A Not when I inherited them. I'm sorry.  
7 That's not true. I think it was before that. My  
8 father was alive.  
9 Q When you inherited your interest in these  
10 adult entertainment clubs we have been talking about,  
11 there was a claim for wage and hour violation existing  
12 at the time; correct?  
13 MR. FUCHS: Objection to form. If you  
14 know what he's talking about, you can answer.  
15 THE WITNESS: No. I don't know what  
16 you're talking about.  
17 BY MR. DUDLEY:  
18 Q Okay. You know the lawsuit I'm talking  
19 about; correct?  
20 A I don't know what you're talking about,  
21 which one you're talking about.  
22 Q Okay. When you inherited your interest in  
23 Pony Tail, Inc., was there a lawsuit out there brought  
24 by a young woman named Clincy?  
25 A I don't know.

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1 Q You don't know whether the lawsuit existed?  
2 A No.  
3 Q You never heard of that?  
4 A No.  
5 Q You didn't have a discussion with Dennis  
6 Williams when you inherited your interest about the  
7 status of that lawsuit?  
8 A I don't know which lawsuit you're talking  
9 about. I know there was one that we were paying a  
10 settlement on.  
11 Q Okay.  
12 A I don't know. I don't know which one you're  
13 talking about.  
14 Q You testified that your father died in  
15 January of 2012?  
16 A That's right.  
17 Q And --  
18 MR. FUCHS: Objection. I think it was  
19 December of 2012.  
20 MR. DUDLEY: I'm sorry.  
21 BY MR. DUDLEY:  
22 Q Was it December --  
23 A Oh, you said January?  
24 Q I'm sorry.  
25 A Yeah. December.

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1 Q December of 2012? Okay. And you're saying  
2 that you understood the lawsuit had been settled  
3 before -- before his --  
4 A I don't -- I don't know which lawsuit you're  
5 talking about. I know there was one that was settled.  
6 Q That's the one I'm talking about --  
7 A Okay.  
8 Q -- the one you know about.  
9 A Well, then it wasn't -- it was settled. It  
10 wasn't an ongoing lawsuit.  
11 Q Okay. When you inherited your interest, you  
12 were told by Dennis that a wage and hour case had been  
13 settled; correct?  
14 A Correct.  
15 Q All right. And you understood that that was  
16 a lawsuit brought by former or then entertainers of  
17 the Onyx; correct?  
18 A Yes.  
19 Q And you were told that that case had been  
20 settled.  
21 A Correct.  
22 Q Now, were you aware of that lawsuit before  
23 you inherited your interest?  
24 A Yes.  
25 Q And how were you aware of it?

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1 A Just my father.  
2 Q What did your father tell you about it?  
3 A Just that there was a lawsuit.  
4 Q All right. But you understood it was  
5 because the entertainers in that case were claiming  
6 that they were misclassified as independent  
7 contractors.  
8 A I don't know what they were claiming.  
9 Q You don't know whether they were claiming  
10 that they were misclassified as independent  
11 contractors?  
12 A No, I don't.  
13 Q And you were --  
14 A I didn't read it.  
15 Q You were aware that they were claiming they  
16 were owed minimum wage; correct?  
17 MR. FUCHS: Objection. I think she  
18 just said she doesn't know what they were  
19 claiming.  
20 BY MR. DUDLEY:  
21 Q Well, you said you talked to your dad about  
22 it.  
23 A I did not say that, only that he said there  
24 was a lawsuit. I didn't go into discussions with him  
25 about his affairs.

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1 Q But once you inherited your interest in it  
2 and you realized that the club was paying out  
3 1.5 million or whatever it was to the claimants in the  
4 case, you had a discussion with Dennis Williams about  
5 that; right?  
6 A No. Those were already set. And I didn't  
7 have to have a discussion with Dennis Williams about  
8 that lawsuit.  
9 Q Okay. So what did you discuss with Dennis  
10 Williams about that lawsuit?  
11 A Nothing.  
12 Q You discussed nothing with him.  
13 A It was already --  
14 Q Has that been your testimony in prior  
15 depositions?  
16 A It was already -- I don't know. I don't  
17 remember. I don't -- I don't remember ever having a  
18 conversation with Dennis about the Onyx lawsuit.  
19 Those were already in place. And the payments were  
20 already set up by Christian. I don't remember.  
21 Q Did you give a deposition in the Geter  
22 versus Galardi South Enterprises, Inc., case on or  
23 about March the 25th, 2015?  
24 A I don't know the date. But if that's what  
25 it says, I'm sure that that's what happened.

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1 Q Harlan Miller was the attorney in that case.  
2 Do you remember him examining you?  
3 A Yes, I do.  
4 Q Do you remember him asking you: So soon  
5 after you took over, you learned that there had been  
6 this lawsuit and it was against the club Onyx?  
7 A Right.  
8 Q And you said, "Right." That was your answer  
9 then.  
10 A Okay.  
11 Q Is that correct?  
12 A Yes.  
13 Q All right. And then he asked you: And it  
14 had been settled; is that right?  
15 A Right. That's I just told you.  
16 Q And you said "right" again.  
17 A That's right.  
18 Q And that case was settled sometime in 2011.  
19 Does that sound right to you?  
20 A I have no idea.  
21 Q Well, you said, "Yeah."  
22 A Well, I guess it was.  
23 Q "Before my father died," was your answer.  
24 A It was before he died, so --  
25 Q Was that true when you said it?

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1 A I guess.  
2 Q Okay. So did Mr. Williams try to bring you  
3 up to speed on what these lawsuits were about? Your  
4 answer was "yes." Did you say that?  
5 A He brought me up to speed on what we owed.  
6 And we didn't have any --  
7 Q Did you answer "yes" to that question?  
8 A I don't know. I don't know. I don't  
9 remember.  
10 Q And then Mr. Miller asked you: What did he  
11 tell you?  
12 And you said: Well, he basically told me  
13 that they were wage and hourly and there was a dispute  
14 over independent contract or employee, that type of  
15 thing.  
16 A Okay.  
17 Q Did you say that?  
18 A I guess I did if it says I did.  
19 Q And you understood that the essence of the  
20 suit was that the entertainers claimed that they  
21 should be treated as employees and paid a minimum  
22 wage. The club had treated them as independent  
23 contractors and had not paid them wages, per se; is  
24 that right?  
25 A Well, I didn't say all that.

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1 Q That was his question to you.  
2 A Oh, okay.  
3 Q And you said: If they wanted to be treated  
4 as employees, they would have been treated as  
5 employees.  
6 A That's correct.  
7 Q They don't want to be treated. They are  
8 professional entertainers, was your answer.  
9 A That's right.  
10 Q Sounds like to me you understood what the  
11 dispute was about, did you not?  
12 A Well, I understand that if they want to be  
13 treated as employees, they would be treated as  
14 employees.  
15 Q I understand that is your opinion. But you  
16 understood what the dispute was --  
17 A That was --  
18 Q -- at the time.  
19 A -- the answer to my question.  
20 Q And you understood what --  
21 A That was the answer to my question.  
22 Q And you understood what the dispute was at  
23 that time; right?  
24 A That was the answer to my question.  
25 Q Okay. And you had also understood, from

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1 your discussion with Mr. Williams, that the Court had  
2 made an adverse ruling as to Onyx on the issue of  
3 whether the dancers were independent contractors or  
4 employees; correct?  
5 A I don't know what the Court said.  
6 Q Do you want to go through this exercise  
7 again?  
8 A Whatever I said, I said. I just -- you  
9 know, there's -- I don't know what the Court said. I  
10 didn't read the document. If Dennis told me that and  
11 I said it, I guess Dennis told me that.  
12 Q Did Dennis tell you that?  
13 A I don't remember. That was a long time ago.  
14 Q Let me read you what Mr. Miller asked you.  
15 A Okay.  
16 Q So then when you came into your position of  
17 CEO after your father's death, you knew that there had  
18 been an adverse ruling on the independent contractor  
19 issue with regards to one of the clubs in Atlanta; is  
20 that right?  
21 And your response was "right."  
22 Now, was that true when you responded?  
23 A If that's how I responded. I don't  
24 remember. I don't remember all of these.  
25 Q When you gave this testimony under oath, did

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1 you tell the truth?  
2 A I'm sure I did.  
3 Q Okay. And if that wasn't clear enough, he  
4 then asked you: You knew when you took over as CEO  
5 that there had been an adverse ruling with respect to  
6 one of the clubs in Atlanta; is that right?  
7 A I already --  
8 Q Your answer, "yes."  
9 A -- told you, yes.  
10 Q Do you know whether Mr. Fuchs represented  
11 your father and Pony Tail, Inc., in that case?  
12 A I don't know.  
13 Q Do you know whether Mr. Fuchs gave legal  
14 advice to your father about --  
15 A I don't know.  
16 Q Let me finish the question -- about the  
17 Clincy litigation?  
18 A I don't know.  
19 Q To your knowledge, did Mr. Fuchs give legal  
20 advice to you or Pony Tail, Inc., about the Clincy  
21 decision?  
22 A Not to me.  
23 Q Everything you know about -- everything you  
24 know about Clincy came from Mr. Williams?  
25 A Yes.

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1 Q Are you aware of a lawsuit that was brought  
2 by an entertainer named -- last name Lemon against  
3 Galardi South Enterprises for another wage and hour  
4 violation in September of 2013?  
5 A No. I don't -- that doesn't sound familiar.  
6 Q But at that time you were an officer and  
7 owner of Pony Tail, Inc; Country Club, Inc., in  
8 Georgia; and --  
9 A Doesn't sound familiar.  
10 Q -- and TROP, Inc.; correct?  
11 A What time -- what year was it?  
12 Q The lawsuit was brought in September the  
13 19th, 2013.  
14 A I don't remember. September? I don't know.  
15 Q September 19th --  
16 A I don't know what that is.  
17 Q -- 2013.  
18 A I don't know what it is.  
19 Q It was brought against Galardi South  
20 Enterprises Consulting, Inc.  
21 Do you know what that company is?  
22 A It must not -- it doesn't really do  
23 anything, I don't think. There's no --  
24 Q Do you own that company?  
25 A There's no employees.

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1 Q Do you own that company?  
2 A Galardi South Consulting -- Galardi South is  
3 just a name that we answer the phone with.  
4 Q Do you own Galardi --  
5 A I don't know.  
6 Q Let me finish my question. We're going to  
7 be here a very long time. I know you want to  
8 anticipate my question. But, first of all, she's got  
9 to hear the question.  
10 A That's fine. I apologize.  
11 Q Do you own Galardi South Enterprises  
12 Consulting, Inc.?  
13 A I don't know.  
14 Q You do not know whether you own it?  
15 A No.  
16 Q Are you an officer --  
17 A I can't --  
18 Q -- of that company?  
19 A I'm not sure.  
20 Q Do you know what that company does?  
21 A No.  
22 Q Would it be safe to say that that, perhaps,  
23 is some company affiliated with your father?  
24 A I don't know. He may have created it. I  
25 don't know.

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1 Q Did you inherit an interest in that company?  
2 A That company doesn't own anything. It  
3 doesn't do anything, so I don't know. I've never seen  
4 it on anything, so I don't know.  
5 Q Ms. Galardi, I will submit to you that this  
6 is not the first time somebody has asked you about  
7 that company.  
8 A Okay. I know that the company exists. Do I  
9 know who's on the documents? I don't. I can't recall  
10 who's on those documents. I know it exists.  
11 Q Are you aware that Dean Fuchs, William  
12 Schulten, and Susan Murphey represented Galardi South  
13 Enterprises Consulting, Inc., in that case?  
14 A No. I don't know. I'm telling you I don't  
15 remember. Okay? I don't remember that case.  
16 Q Do you -- I'm not asking you about the case.  
17 I'm asking you about Galardi South Enterprises  
18 Consulting, Inc., which you -- which you have been --  
19 A Well, you're asking me --  
20 Q -- asked about repeatedly.  
21 A -- about a case of some Lemon against  
22 Galardi South Consulting. Isn't that what you're  
23 asking me about?  
24 Q Do you understand that case was against  
25 Goldrush?

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1 A I don't know.  
2 Q As the owner of Goldrush, would you be  
3 notified of a wage and hour case that was brought  
4 against the company?  
5 A Probably. I just don't remember.  
6 Q Do you know whether you were given advice or  
7 Galardi South Enterprises Consulting was given advice  
8 about this matter?  
9 A I don't know. I don't remember that case,  
10 so I don't know. I'm saying I don't remember. I  
11 don't remember.  
12 Q After you had had your conversation with  
13 Mr. Williams about the Clincy case, did you take any  
14 acts to change the way the wage and hour policies were  
15 done at Onyx or any other club in which you had an  
16 interest?  
17 MR. FUCHS: Objection to form. If you  
18 understand, you can answer.  
19 THE WITNESS: Our employees are treated  
20 as employees. Our entertainers are entertainers.  
21 I don't get involved in that, so I don't know.  
22 BY MR. DUDLEY:  
23 Q After you were -- after you were informed of  
24 the Clincy decision, did you take any action to  
25 classify entertainers as employees rather than

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1 independent contractors?  
 2 A No. I wouldn't get involved in stuff like  
 3 that.  
 4 Q Did you undertake any acts to determine  
 5 whether any of these clubs we're talking about were  
 6 compliant with the FLSA?  
 7 A We comply with the FLSA.  
 8 Q I know you think you do. But did you --  
 9 A Okay. Well --  
 10 Q -- make any changes?  
 11 A -- I think we do.  
 12 Q Okay. You think you do.  
 13 A I think we do.  
 14 Q Even though Judge Story told you you didn't,  
 15 you still think you do.  
 16 A Yes.  
 17 MR. FUCHS: Objection. Form.  
 18 BY MR. DUDLEY:  
 19 Q All right. I'll ask you the question again.  
 20 Did you take any action, after you were  
 21 informed of the Clincy case from Mr. Williams, to make  
 22 sure that any of the clubs you have an interest in  
 23 complied with the FLSA as it pertains to entertainers?  
 24 MR. FUCHS: Objection to form. I think  
 25 she just answered that.

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1 But you can answer it again.  
 2 THE WITNESS: I'm not answering it  
 3 again.  
 4 MR. DUDLEY: Read back the question,  
 5 please, and the prior one.  
 6 (Discussion off the record.)  
 7 (The record was read by the reporter as  
 8 follows:  
 9 "Q Did you undertake any acts to  
 10 determine whether any of these clubs we're  
 11 talking about were compliant with the FLSA?  
 12 "A We comply with the FLSA.")  
 13 BY MR. DUDLEY:  
 14 Q Could you please answer that question.  
 15 A I did.  
 16 Q No, you didn't.  
 17 A Yes, I did.  
 18 Q After your meeting --  
 19 A We comply with the FLSA where we're required  
 20 to comply with the FLSA.  
 21 MR. DUDLEY: Okay. Go back to my final  
 22 question.  
 23 (The record was read by the reporter as  
 24 follows:  
 25 "Q All right. I'll ask you the question

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1 again. Did you take any action, after you were  
 2 informed of the Clincy case from Mr. Williams,  
 3 to make sure that any of the clubs you have an  
 4 interest in complied with the FLSA as it  
 5 pertains to entertainers?")  
 6 THE WITNESS: Not my job.  
 7 MR. DUDLEY: Again, you're not  
 8 answering the question. I'm objecting to the --  
 9 THE WITNESS: Because it's not --  
 10 MR. DUDLEY: You're not responding to  
 11 the question.  
 12 THE WITNESS: I'm telling you.  
 13 MR. DUDLEY: Could you please read the  
 14 question to her once more.  
 15 THE WITNESS: You want me to answer yes  
 16 or no to something that is not in my realm of job  
 17 duties. I don't make those kinds -- we comply.  
 18 We follow the law.  
 19 MR. DUDLEY: Again, I object to the  
 20 nonresponsiveness of your answer.  
 21 THE WITNESS: Okay.  
 22 MR. DUDLEY: Could you please read that  
 23 back to her one more time.  
 24 THE WITNESS: You want a yes or no  
 25 answer, and it's just not a yes or no thing.

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1 MR. DUDLEY: Could you please read that  
 2 back to her one more time.  
 3 (The record was read by the reporter as  
 4 follows:  
 5 "Q All right. I'll ask you the question  
 6 again. Did you take any action, after you were  
 7 informed of the Clincy case from Mr. Williams,  
 8 to make sure that any of the clubs you have an  
 9 interest in complied with the FLSA as it  
 10 pertains to entertainers?")  
 11 THE WITNESS: I didn't have any  
 12 conversations with Dennis Williams about the  
 13 entertainers in that case.  
 14 BY MR. DUDLEY:  
 15 Q What acts, Mrs. Galardi, have you  
 16 undertaken, after you inherited your interest in these  
 17 adult entertainment clubs, to make sure they complied  
 18 with the FLSA as to entertainers?  
 19 A I don't deal with the entertainers.  
 20 MR. DUDLEY: Read the question again.  
 21 THE WITNESS: I understand the  
 22 question. It's not something that I would do.  
 23 And I'm here as Teri Galardi personally; right?  
 24 MR. DUDLEY: I'm not here to advise  
 25 you. You'll have to talk to your attorney about

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1 that. Could you please read that question back.  
 2 THE WITNESS: I'm here as Teri Galardi?  
 3 MR. FUCHS: Just do the best you can to  
 4 try to answer his question. I think you've  
 5 answered it. That's my opinion. Obviously,  
 6 Mr. Dudley disagrees.  
 7 MR. DUDLEY: I very much disagree. And  
 8 it's on the record.  
 9 MR. FUCHS: So I don't know how long  
 10 you want to go around and around.  
 11 MR. DUDLEY: I'm going to do it until I  
 12 get an answer.  
 13 MR. FUCHS: Well, I think she's doing  
 14 the best she can.  
 15 MR. DUDLEY: We're going to do this the  
 16 right way. And I'm going to ask --  
 17 MR. FUCHS: And, of course, that's your  
 18 way.  
 19 MR. DUDLEY: No.  
 20 THE WITNESS: You want -- but you want  
 21 me to be truthful.  
 22 MR. DUDLEY: Of course, I want to you  
 23 to be truthful.  
 24 THE WITNESS: I've sworn an oath to be  
 25 truthful.

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1 MR. DUDLEY: Read the question back,  
 2 please.  
 3 (The record was read by the reporter as  
 4 follows:  
 5 "Q What acts --")  
 6 THE WITNESS: We comply with the FLSA.  
 7 MR. DUDLEY: Read the question back  
 8 again, please.  
 9 THE WITNESS: Go ahead. You can keep  
 10 reading it all you want to, but that's how I'm  
 11 going the answer the question.  
 12 MR. DUDLEY: Well, we're going to be  
 13 here a very long time.  
 14 THE WITNESS: Okay. If you want me to  
 15 answer in some way that I don't agree with, then  
 16 we're going to be here a long time, because I'm  
 17 not going to do it.  
 18 MR. DUDLEY: You haven't answered the  
 19 question after all --  
 20 THE WITNESS: I did answer the  
 21 question.  
 22 MR. DUDLEY: I'm not here to argue with  
 23 you. I'm here to ask questions, and it's your --  
 24 THE WITNESS: I answered the question.  
 25 MR. DUDLEY: I'm going to get an answer

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1 to the question.  
 2 THE WITNESS: I answered it.  
 3 MR. DUDLEY: Somebody's either going to  
 4 force you to answer it, the arbitrator. You're  
 5 going to answer it. You're in a legal proceeding  
 6 here.  
 7 THE WITNESS: I answered it.  
 8 MR. DUDLEY: It's an appropriate  
 9 question, and I'm going to expect a truthful  
 10 response.  
 11 THE WITNESS: That was a truthful  
 12 response.  
 13 MR. DUDLEY: Read back the question  
 14 again, please.  
 15 THE WITNESS: Is there a different way  
 16 you want me to answer his question?  
 17 MR. FUCHS: I can't --  
 18 THE COURT REPORTER: I can't read back  
 19 and write.  
 20 MR. FUCHS: I can't tell you how to  
 21 answer. All I can tell you is to listen the best  
 22 you can to his question and answer to the best of  
 23 your ability. He's asking you -- I think he's  
 24 asking you what acts you took.  
 25 MR. DUDLEY: Read it back. It's very

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1 particular.  
 2 MR. FUCHS: I'm trying to help her  
 3 here. I think he's asking you what acts, if any,  
 4 you took in response, I guess, to learning about  
 5 the Pony Tail case, the Onyx case. And your  
 6 answer has been "we've complied." I think he's  
 7 looking for any specific acts that you can recall  
 8 taking, if any, in response.  
 9 THE WITNESS: I don't recall taking any  
 10 acts.  
 11 MR. DUDLEY: Thank you.  
 12 MR. FUCHS: Can we take a break,  
 13 Ainsworth?  
 14 MR. DUDLEY: Yes.  
 15 (Brief pause in the proceedings.)  
 16 BY MR. DUDLEY:  
 17 Q All right. Ms. Galardi, are you aware of a  
 18 lawsuit that was filed by Sametha Glen against Galardi  
 19 South Enterprises, Inc.; Pony Tail, Inc.; Galardi  
 20 South Enterprises Consulting, Inc.; and you  
 21 personally, November the 6th, 2013?  
 22 A Yes.  
 23 Q And that was another wage and hour case like  
 24 the one before the arbitrator today; correct?  
 25 A Yes.

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1 Q In that case, the claimant -- and you have a  
2 plaintiff and whoever else joined it -- was alleging  
3 that they were denied the minimum wage, that they were  
4 misclassified as an independent contractor, and that  
5 they were owed wages under the FLSA; correct?  
6 A Yes. I don't remember every detail, but I  
7 know it was a wage and hourly.  
8 Q Dean Fuchs, Stephen Whitfield Brown, William  
9 Scott Schulten, Abby Grozine, and Susan Murphey  
10 represented you in that matter?  
11 A Yes.  
12 Q Did they give you legal advice in that case?  
13 A I don't remember.  
14 Q You don't remember whether you got any legal  
15 advice?  
16 A I'm sure I did. I just -- I don't remember  
17 what --  
18 Q I'm not asking -- I don't want you to tell  
19 me what you got. I just want to know whether you  
20 sought legal advice and whether you received it.  
21 A I didn't get any advice, I don't think.  
22 Q Why did you hire these -- one, two, three,  
23 four -- five attorneys to represent you?  
24 A Because they're our attorneys that represent  
25 us. This relationship has been long before me, so --

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1 Q After this Glen case was filed against you  
2 and these entities, did you undertake any acts to make  
3 sure these clubs were complying with the FLSA?  
4 A Can you be more specific?  
5 Q No, I can't.  
6 MR. DUDLEY: Can you read that back,  
7 please.  
8 THE WITNESS: I don't recall taking any  
9 acts.  
10 MR. FUCHS: She's trying to answer your  
11 question.  
12 MR. DUDLEY: Okay.  
13 THE WITNESS: I don't recall taking any  
14 acts. I feel we are compliant with the FLSA.  
15 BY MR. DUDLEY:  
16 Q Okay. Do you know whether anyone else on  
17 your behalf or on behalf any of these other entities  
18 took any acts to --  
19 A I don't know.  
20 Q You're aware of a lawsuit brought by a  
21 Mrs. Gardner, who is a former entertainer of Country  
22 Club, Inc., in South Carolina, which was operating as  
23 Masters, filing an FLSA claim on December the 5th,  
24 2013, are you not?  
25 A I know the name. I've heard of the case.

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1 Yes.  
2 Q You're aware of the -- aware of the case.  
3 A Mm-hm (affirmative).  
4 Q And that was against Galardi South  
5 Enterprises Consulting, Inc., and Country Club, Inc.;  
6 right?  
7 A I'm not sure who all was listed in that,  
8 but --  
9 Q Again, you don't know anything about the  
10 Galardi South Enterprises Consulting, Inc., company?  
11 A They pull those names out. They are --  
12 they're meaningless. They don't -- they're -- it's  
13 just a -- they pull whatever names they can find  
14 connected to anything. It doesn't really do anything.  
15 Q Okay. Country Club, Inc., doing business as  
16 Masters Gentleman's Club, they do something; right?  
17 A Yes.  
18 Q They operate the --  
19 A Right.  
20 Q -- club that you own in South Carolina?  
21 A Right.  
22 Q All right. And in that case, they hired  
23 Trenton H. Chambers, Dean Fuchs, Susan Murphey -- and  
24 Susan Murphey to represent you in that case; correct?  
25 A Yes.

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1 Q All right. Did they advise you about the  
2 FLSA and the classification of these workers?  
3 MR. FUCHS: I'm going to make an  
4 objection. I don't want you to discuss any  
5 substance of any legal advice that may or may not  
6 have been given to you. I think he's asking a  
7 yes or no question, whether advice was given to  
8 you.  
9 THE WITNESS: Okay.  
10 MR. FUCHS: You can answer that.  
11 THE WITNESS: Yes.  
12 BY MR. DUDLEY:  
13 Q Yes, advice was given?  
14 A On -- on which one are you talking about  
15 now?  
16 MR. FUCHS: Masters club.  
17 BY MR. DUDLEY:  
18 Q The Gardner, Country Club, Inc., case.  
19 A Actually, no, on that one. No.  
20 Q You received --  
21 A I --  
22 Q -- advice, but --  
23 A I didn't talk to them about that case.  
24 Q All right. Is it your understanding that  
25 Galardi South Enterprises Consulting, Inc., and

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1 Country Club, Inc., retained these attorneys for the  
 2 purpose of defending that lawsuit?  
 3 A Yes.  
 4 Q Is it your understanding that these  
 5 attorneys gave Country Club, Inc., advice about this  
 6 lawsuit?  
 7 A Yes.  
 8 Q You just don't know who that advice was  
 9 given to. Is that what you're saying?  
 10 A That's correct.  
 11 Q Let me ask you about that, since we're going  
 12 to be going through a number of these.  
 13 Who on behalf of the entities we've talked  
 14 about so far, who is handling the communications with  
 15 the attorney? When I say "handling," I mean who is  
 16 communicating with the attorneys about the issues in  
 17 these lawsuits?  
 18 A Dennis Williams.  
 19 Q Anyone else?  
 20 A In South Carolina, Mike Kap, possibly.  
 21 Q Okay. And what sort of role have you played  
 22 in the ones we've talked about?  
 23 A None.  
 24 Q You've delegated that authority to them to  
 25 deal with?

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1 A That's correct.  
 2 Q Do you know whether there was an adverse  
 3 ruling by the District Court in South Carolina about  
 4 the classification issue?  
 5 A No, I don't.  
 6 Q So you were not advised by any attorneys  
 7 that there had been an adverse ruling?  
 8 A No.  
 9 MR. FUCHS: Objection. Don't answer  
 10 that question. It goes to substance.  
 11 BY MR. DUDLEY:  
 12 Q Presumably, that would be something that  
 13 would be discussed with Mr. Williams or Mr. Kap; is  
 14 that correct?  
 15 A Correct.  
 16 Q Do you know whether anybody on behalf of you  
 17 or Country Club, Inc., or Galardi South Enterprises  
 18 Consulting, Inc., took any actions after the Gardner  
 19 case was filed to make sure that Country Club, Inc.,  
 20 operating as Masters, complied with the FLSA?  
 21 A Me, personally? I don't know. I didn't.  
 22 No. I don't know about what they did. I can't answer  
 23 that.  
 24 Q Who is responsible for making sure that any  
 25 of the clubs, adult entertainment clubs, you own are

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1 in compliance with the FLSA?  
 2 A Who is responsible for making sure that  
 3 everyone is in compliance?  
 4 Q Your clubs.  
 5 A Well, it would be our operations. Would be  
 6 managers, would be Mike Kap, Dennis Williams.  
 7 Q Anyone else?  
 8 A Payroll.  
 9 Q Mike Kap, Dennis Williams. Who else?  
 10 A I don't know.  
 11 Q Is there any particular person at the club  
 12 level --  
 13 A I don't know.  
 14 Q -- who deals with that?  
 15 A Don't know.  
 16 Q Are you aware of a lawsuit brought by a  
 17 Ms. Espinoza and others against Galardi South  
 18 Enterprises, Inc.; Galardi South Enterprises  
 19 Consulting, Inc.; Fly Low, Inc.; Teri Galardi; Michael  
 20 Kap; Dennis Williams; LVA Management Consulting, Inc.;  
 21 AQFC, LLC; Kodrenyc, LLC; AK'N Eli, LLC; Akinyele  
 22 Adams; Nitty 'N AK Corporation; and Jack E. Galardi,  
 23 LLC? Excuse me. One more.  
 24 A Well, they pulled --  
 25 Q MBJG --

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1 A They pulled a lot out of that one, didn't  
 2 they?  
 3 Q Let me add one more. My question is not  
 4 finished -- MBJG Investment Corporation.  
 5 A I am aware of the case.  
 6 Q And Rick Taylor and JEG Family Trust?  
 7 A Wow. Yeah.  
 8 Q You're aware of that case. And that was  
 9 filed in April the 8th, 2014. And that was an FLSA  
 10 case also, was it not?  
 11 A Yes.  
 12 Q And that was brought by entertainers against  
 13 those persons and entities --  
 14 A Right.  
 15 Q -- correct? Correct?  
 16 A Right.  
 17 Q And you hired Dean Fuchs, Susan Murphey,  
 18 William Scott Schulten, Daniel Wayne Matlow, and  
 19 Stephen Whitfield Brown to represent you in that  
 20 matter; correct?  
 21 A Personally?  
 22 Q Yes.  
 23 A Was I named personally in that?  
 24 Q Yes.  
 25 A Okay. Then I probably would have hired them

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1 personally.  
2 Q Did those lawyers give you advice in that  
3 case?  
4 A Yes.  
5 Q They gave you advice about the  
6 classification of the entertainers; correct?  
7 MR. FUCHS: Objection. Form. Don't  
8 answer that question.  
9 MR. DUDLEY: Are you saying that  
10 invades the --  
11 MR. FUCHS: Yes.  
12 MR. DUDLEY: -- attorney-client, the  
13 fact that they gave advice?  
14 MR. FUCHS: Yes.  
15 MR. DUDLEY: Not revealing the  
16 substance of the communications?  
17 MR. FUCHS: Yes.  
18 MR. DUDLEY: Well, I disagree with you.  
19 That's --  
20 MR. FUCHS: That's fine.  
21 MR. DUDLEY: -- not considered a --  
22 MR. FUCHS: That's fine.  
23 MR. DUDLEY: -- attorney-client  
24 communication.  
25 MR. FUCHS: That's fine. If you say

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1 so.  
2 MR. DUDLEY: Okay. Fine. You're going  
3 to instruct her not to answer?  
4 MR. FUCHS: I think I have.  
5 BY MR. DUDLEY:  
6 Q Okay. Did those attorneys give you advice  
7 about the classification of entertainers?  
8 MR. FUCHS: Don't answer that question.  
9 BY MR. DUDLEY:  
10 Q Did they give you advice about the meaning  
11 of a service charge under the FLSA?  
12 MR. FUCHS: Don't answer that question.  
13 BY MR. DUDLEY:  
14 Q Did they give you advice about whether the  
15 minimum wage should be paid to these entertainers?  
16 MR. FUCHS: Don't answer that question.  
17 BY MR. DUDLEY:  
18 Q Do you know whether there was an order  
19 entered in that case ruling that the dancers were  
20 employees rather than independent contractors?  
21 MR. FUCHS: Objection to form. If you  
22 know, you can answer.  
23 THE WITNESS: I don't know.  
24 BY MR. DUDLEY:  
25 Q Are you aware of a lawsuit brought by an

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1 entertainer with the last name Mickle against Country  
2 Club, Inc., doing business as Goldrush, April  
3 the 22nd, 2014, alleging the same FLSA violations?  
4 A No.  
5 Q Is it customary for you not to know about  
6 FLSA lawsuits that are brought against companies you  
7 own?  
8 A I may be -- I'm usually told, but it doesn't  
9 mean I remember them.  
10 Q Did you take any acts or did anyone on your  
11 behalf take any acts after the Espinoza case was filed  
12 to make sure that --  
13 A Is that the Fly Low?  
14 Q I believe that Fly Low was one of the  
15 defendants in that case.  
16 A Well, that club was sold.  
17 Q Okay.  
18 A Like two months -- two months after that, so  
19 I don't know what they did.  
20 Q What's the status of that club now? Is  
21 it --  
22 A It's not mine.  
23 Q Okay. So your contention there would be  
24 there's no acts for you to take because you don't own  
25 it anymore; right?

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1 A That's right.  
2 Q Do you have an interest in a company called  
3 Bella Mia, Inc.?  
4 A Yes.  
5 Q Is that an adult entertainment club?  
6 A Yes.  
7 Q Where is that club?  
8 A Florida.  
9 Q Where in Florida?  
10 A I believe that's the Doral club.  
11 Q That's what you referred to earlier as the  
12 Pink Pony Doral?  
13 A Mm-hm (affirmative).  
14 Q So that's Bella Mia, Inc., doing business as  
15 the Pink Pony?  
16 A I think so. I don't know. My dad had a lot  
17 of Bella Mia, Mia Luna.  
18 Q Where do those come from? Do you know?  
19 A I don't know.  
20 Q That's a company you own?  
21 A Mm-hm (affirmative).  
22 Q Are you the officer?  
23 A No.  
24 Q You're not?  
25 A I don't think so.

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1 Q You're not an officer of that company?  
2 A I don't think so.  
3 Q Who do you understand is?  
4 A Jennifer -- Jennifer Saunders and Steve  
5 Ennis.  
6 Q Are you aware of an entertainer named  
7 Minervini and others bringing an FLSA lawsuit on  
8 March the 31st, 2014, against Bella Mia, doing  
9 business as the Pink Pony?  
10 A Yes.  
11 Q And you were an individual in that case,  
12 individually named in that case also, were you not?  
13 A I don't know.  
14 Q You don't know if you were sued?  
15 A I don't remember. If it says I was, then I  
16 guess I was.  
17 Q Galardi South Enterprises, Inc., and Galardi  
18 South Enterprises Consulting, Inc., were also named as  
19 parties in that case?  
20 A If that's what it says. I don't know. You  
21 have the paper.  
22 Q It says in that case you were represented by  
23 Daniel Wayne Matlow; is that correct?  
24 A Yes.  
25 Q Who is Daniel Wayne Matlow?

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1 A An attorney in Florida.  
2 Q Mr. Matlow -- well, strike that.  
3 Did you seek legal advice from Mr. Matlow in  
4 that case?  
5 A I didn't. I didn't talk with him a lot. I  
6 talked with him maybe once.  
7 Q And when was that?  
8 A I don't know.  
9 Q Was that after the lawsuit had been filed?  
10 A Well, I wouldn't have talked to him before  
11 the lawsuit would have been filed.  
12 Q I don't know whether you would or not.  
13 A No.  
14 Q Has he represented you on more than one  
15 matter?  
16 A I don't know.  
17 Q Did you take any actions to make sure that  
18 Bella Mia complied with the FLSA after receiving this  
19 lawsuit?  
20 A Those were bartenders who were on payroll.  
21 Q They were?  
22 A Yes, they were.  
23 Q Okay. What were they alleging?  
24 A I believe, some overtime or whatever. They  
25 were on payroll. They had timecards. We settled with

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1 them just to avoid legal fees.  
2 Q Okay. Are you aware of a lawsuit brought by  
3 someone named Carter against Galardi South  
4 Enterprises, Inc.?  
5 A No.  
6 Q This lawsuit named Galardi South  
7 Enterprises, Inc., as a defendant; Galardi South  
8 Enterprises Consulting, Inc., as a defendant; Pony  
9 Tail, Inc., as a defendant, doing business as Onyx;  
10 Teri Galardi, individually, as a defendant.  
11 Are you telling me --  
12 A I don't remember.  
13 Q -- you're not aware of that lawsuit?  
14 A I don't remember. I don't know.  
15 Q The docket sheet in the case indicates it  
16 was filed in September the 2nd, 2014.  
17 You don't recall being served or notified of  
18 this lawsuit sometime after that date?  
19 A Don't remember the name.  
20 Q Okay. The Onyx is a club you own; correct?  
21 A Correct.  
22 Q You were represented by Mr. Fuchs in that  
23 matter?  
24 A I guess I probably was, but I don't remember  
25 that name.

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1 Q Do you know whether you sought legal advice  
2 in that matter?  
3 A I don't remember doing anything with one  
4 named Carter.  
5 Q You don't know whether that was settled on  
6 your behalf?  
7 A I have no idea.  
8 Q Let me correct that. You don't know whether  
9 that's still pending?  
10 A I don't know.  
11 Q And you have not participated in any  
12 mediations with Judge Grayford?  
13 A No.  
14 Q Are you aware of an FLSA case brought by  
15 Alyssa Hanson on behalf of herself and others  
16 similarly situated against Country Club, Inc., doing  
17 business as Goldrush Showbar; TROP, Inc., doing  
18 business as Pink Pony? Are you aware of that?  
19 A I don't recall the name.  
20 Q Are you aware of the lawsuit?  
21 A I don't recall the name Hanson.  
22 Q Are you aware of this lawsuit being filed?  
23 A I don't know.  
24 Q In front of --  
25 A I don't know what it is.

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1 Q -- Judge Totenberg?  
2 A I don't know.  
3 Q Do you know whether TROP, Inc., or Pony  
4 Tail, Inc., were given any legal advice about this  
5 matter?  
6 A I don't know. It doesn't sound familiar to  
7 me. I don't know about it at all. Don't remember.  
8 Q Are you aware of a lawsuit brought by  
9 Jennifer Backus against Country Club, Inc. --  
10 A I don't know that name either.  
11 Q Let me finish -- on April the 1st, 2015?  
12 A No.  
13 Q The docket sheet in that case represents  
14 that Dean Fuchs and Stephen Whitfield Brown  
15 represented Country Club, Inc.  
16 Do you know whether they gave any legal  
17 advice about classification of entertainers?  
18 A I don't know.  
19 Q You're aware of a lawsuit brought by  
20 Vernitta Geter and others alleging a Fair Labor  
21 Standards Act violation, on May the 22nd, 2014? Are  
22 you aware of that lawsuit?  
23 A Which club was that?  
24 Q Geter v. Galardi South Enterprises  
25 Consulting, Inc.; Galardi South Enterprises, Inc.; Fly

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1 Low, Inc.; John Steve Ennis; Teri Galardi; Rick  
2 Taylor; Dennis Williams; Akinyele Adams; Terry  
3 Elliot -- are you aware of that lawsuit?  
4 A Yes.  
5 Q And you hired Daniel Wayne Matlow, Dean  
6 Fuchs, Susan Murphey, William Scott Schulten, and  
7 Stephen Whitfield Brown to represent you in that  
8 matter?  
9 A Yes.  
10 Q Did you seek legal advice from them about  
11 the lawsuit?  
12 A Yes.  
13 Q The claims in these two cases that we're  
14 dealing with today involve the same issues, do they  
15 not?  
16 A I guess so.  
17 Q Do you know whether that action is still  
18 pending?  
19 A What action?  
20 Q The one I just asked you about.  
21 A Geter?  
22 Q Geter or Geter.  
23 A Geter or Geter. I believe we settled that.  
24 Q After this lawsuit was filed, did you  
25 undertake any action to ascertain whether your clubs

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1 were in compliance --  
2 A That club was sold.  
3 Q -- compliance with the FLSA?  
4 A That club was sold.  
5 Q Did you take any action in your clubs, other  
6 than this one, to ascertain whether they were in  
7 compliance with the FLSA?  
8 A I don't recall taking any action.  
9 Q Do you know whether anybody took any action  
10 on your behalf or behalf of any of your clubs?  
11 A I don't know. I don't know.  
12 Q Is it not important to you to have  
13 appropriate action taken?  
14 MR. FUCHS: Objection to form. You can  
15 answer, I guess.  
16 THE WITNESS: Ask me again.  
17 MR. DUDLEY: Read back the question,  
18 please.  
19 (The record was read by the reporter.)  
20 THE WITNESS: Is it not important to  
21 me? Yes, it's important to me.  
22 BY MR. DUDLEY:  
23 Q Are you aware of a suit that was brought by  
24 Candace Sittner on behalf of herself and others --  
25 A No.

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1 Q -- against Country Club, Inc. --  
2 A No.  
3 Q -- doing business as the Masters Club and  
4 Mike Kap individually?  
5 A No.  
6 Q You're not aware of that?  
7 A No.  
8 Q Again, you own a hundred percent --  
9 A I do not --  
10 Q -- of Country Club, Inc.  
11 A I don't know the name. Just because I own  
12 it, doesn't mean I know all of that.  
13 Q Do you know whether Dean Fuchs and Stephen  
14 Brown represented Country Club, Inc., in that matter?  
15 A I don't -- I told you I don't remember the  
16 name, so how could I know who represented them in  
17 there -- on that?  
18 Q Well, let me --  
19 A I don't remember the name of that case. I  
20 don't remember it. I was -- I don't know.  
21 Q Well, let me ask you this. Have you used  
22 anyone other than the attorneys at Schulten and Ward  
23 to handle an FLSA matter for you or your clubs since  
24 the Clincy decision?  
25 A In Georgia, no.

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1 Q What about other states?  
 2 A Florida, yeah.  
 3 Q Local counsel in Florida?  
 4 A Right.  
 5 Q What about South Carolina? Local counsel in  
 6 South Carolina?  
 7 A I don't know.  
 8 Q Are you aware of a lawsuit brought by  
 9 Terrence Walker against you and others in the U.S.  
 10 District Court for the Southern District of Florida in  
 11 April or on April the 24th, 2013?  
 12 A I don't recall that name either. What club  
 13 was that?  
 14 Q Fly Low, Inc., doing business as Crazy Horse  
 15 Saloon and you individually.  
 16 A And when was that?  
 17 Q That was in April 2013.  
 18 A I don't even think we were open in  
 19 April 2013. I don't know who that is.  
 20 Q It looks like from the docket sheet that you  
 21 were represented by Daniel Wayne Matlow.  
 22 Does that ring a bell?  
 23 A Yeah. I told you I knew who he was.  
 24 Q He represents you in Florida?  
 25 A On some things.

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1 MR. FUCHS: I'm sorry, Ainsworth. Can  
 2 we go off the record for just a second?  
 3 MR. DUDLEY: That fine.  
 4 (Brief pause in the proceedings.)  
 5 BY MR. DUDLEY:  
 6 Q Mr. Matlow has given you advice, FLSA  
 7 advice, in Florida?  
 8 A You know --  
 9 MR. FUCHS: I'm going to object.  
 10 You're getting into attorney-client privileged  
 11 information. I'm going to direct her not to  
 12 answer.  
 13 MR. DUDLEY: Attorney-client privilege?  
 14 Is that what you're contending?  
 15 MR. FUCHS: Are you asking me?  
 16 MR. DUDLEY: Yes.  
 17 MR. FUCHS: Yes.  
 18 BY MR. DUDLEY:  
 19 Q Do you know what Mr. Walker did for Crazy  
 20 Horse?  
 21 A No.  
 22 Q Crazy Horse is not a male adult  
 23 entertainment club, is it?  
 24 A No.  
 25 Q Would that lead you to believe --

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1 A It was not.  
 2 Q It was not?  
 3 A It doesn't exist.  
 4 Q Would that lead you to believe that maybe he  
 5 does something other than entertaining?  
 6 A Yeah. He's not an entertainer.  
 7 Q Are you aware of a lawsuit filed by Marco  
 8 Watts versus Bella Mia on --  
 9 A Yes.  
 10 Q -- December the 5th, 2014, alleging an  
 11 FLSA violation?  
 12 A Yes. He's a DJ.  
 13 Q And Bella Mia, again, is the Pink Pony down  
 14 in Florida?  
 15 A Yes.  
 16 Q And you were named as a defendant in that  
 17 case?  
 18 A I guess.  
 19 Q You were represented by Gerald Tolbin?  
 20 A Yes.  
 21 Q Who is Gerald Tolbin?  
 22 A An attorney in Florida.  
 23 Q Were you represented by Howard Brodsky?  
 24 A He's his partner.  
 25 Q Did these two gentlemen give you advice

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1 about this matter?  
 2 A They handled -- they talked back and forth  
 3 with us. Yes. Marco Watts was a DJ who was paid.  
 4 Once again, we settled to avoid any further legal  
 5 costs. The lawyers are making quite a bit of money on  
 6 these things.  
 7 Q Well, the club's making quite a bit of money  
 8 too.  
 9 A The dancers make a lot of money. The DJs  
 10 make a lot of money. We pay a lot of taxes and lawyer  
 11 fees.  
 12 Q In that case, do you recall the DJs saying  
 13 they were employees rather than independent  
 14 contractors?  
 15 A I don't know the DJs. I don't know any -- I  
 16 don't know them, but I know that he was paid.  
 17 Q You mentioned a second ago that Mr. Tolbin  
 18 and Mr. Brodsky gave us some advice.  
 19 Who were you referring to when you said  
 20 "us"?  
 21 A It would have been Steve Ennis.  
 22 Q Are you aware of a lawsuit brought by  
 23 Melissa August against Bella Mia on October the 20th,  
 24 2015, alleging a violation of the FLSA?  
 25 A Yes.

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1 Q She was an entertainer?  
 2 A She was a bartender with a paycheck.  
 3 Q This lawsuit had a number of other  
 4 plaintiffs. Were they --  
 5 A Bartenders.  
 6 Q They were all bartenders?  
 7 A Mainly bartenders with paychecks.  
 8 Q When you say "mainly," what other types of  
 9 alleged employees were involved?  
 10 A There might have been a waitress or  
 11 something. I'm not really sure.  
 12 Q Any entertainers?  
 13 A I don't think so. I don't think  
 14 entertainers were on that. Those are all employees.  
 15 Disgruntled employees.  
 16 Q And you were represented by Mr. Brodsky in  
 17 that matter?  
 18 A Correct.  
 19 Q And he advised you on that litigation?  
 20 A Yes.  
 21 Q Are you aware of a lawsuit brought by Tierra  
 22 Anderson on October the 22nd, 2015, alleging a --  
 23 A No.  
 24 Q -- violation of the Fair Labor Standards  
 25 Act?

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1 A No.  
 2 Q You were named as a defendant in that case.  
 3 You're not aware of that lawsuit?  
 4 A Who else was named in that case?  
 5 Q Galardi South Enterprises; Galardi South  
 6 Enterprises Consulting; MBJG; Fly Low; JEG Family  
 7 Trust; Teri Galardi; Rick Taylor; Akinyele Adams.  
 8 A I didn't own the club in 2015. They just  
 9 pulled names out of the computer.  
 10 Q And you hired Dean Fuchs to represent you in  
 11 that case?  
 12 A I was probably dismissed off it. I didn't  
 13 own the club then. I don't know. I don't remember  
 14 that name.  
 15 Q You don't know whether Dean represented you  
 16 in that case?  
 17 THE WITNESS: Did you?  
 18 MR. FUCHS: I'm happy to answer if  
 19 Mr. Dudley wants me to.  
 20 MR. DUDLEY: Unfortunately, it's not --  
 21 MR. FUCHS: But I can't answer. I  
 22 can't answer.  
 23 MR. DUDLEY: -- his deposition.  
 24 THE WITNESS: I don't know. I don't  
 25 even remember the name. And I don't -- I didn't

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1 own the club in 2015.  
 2 BY MR. DUDLEY:  
 3 Q Is it typical for Mr. Fuchs to represent you  
 4 in a lawsuit that you don't know about?  
 5 A If I don't remember the name, I can't --  
 6 that's all I can tell you is I don't remember the  
 7 name.  
 8 Q Is it typical for Mr. Fuchs to represent you  
 9 in a claim that you don't know about?  
 10 MR. FUCHS: Objection to form.  
 11 THE WITNESS: I'm telling you I don't  
 12 remember the name.  
 13 BY MR. DUDLEY:  
 14 Q Okay. Are you aware of a lawsuit brought by  
 15 Jessica De Andino on January the 26th, 2017, alleging  
 16 a violation of the Fair Labor Standards Act against  
 17 TROP, Inc., doing business as Pink Pony?  
 18 A No. I don't know what that one is.  
 19 Q Well, that would have been two months ago.  
 20 You don't remember --  
 21 A Yeah.  
 22 Q -- a lawsuit being filed against you? Let  
 23 me correct that -- against TROP, Inc.?  
 24 A No. I don't know about it.  
 25 Q Are you aware of a lawsuit brought by

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1 Stephanie Kuykendall and others against TROP, Inc.,  
 2 doing business as Pink Pony, on February the 7th,  
 3 2017, alleging that Pink Pony was not arbitrating  
 4 cases that they were required to arbitrate?  
 5 A I don't know that name either. I don't  
 6 recall that name. Who are you representing?  
 7 Q I am representing the claimants against  
 8 these two arbitrations.  
 9 A I don't know who they are. That's what I'm  
 10 asking you, their name.  
 11 Q I will -- unfortunately, I'm taking the --  
 12 he can tell you who they are.  
 13 MR. FUCHS: I'll tell you that  
 14 afterwards.  
 15 THE WITNESS: Okay.  
 16 BY MR. DUDLEY:  
 17 Q You own a club in Las Vegas. Has that club  
 18 been sued by any entertainers for FLSA violations?  
 19 A Not that I'm aware of.  
 20 Q Are you relying on any legal advice as a  
 21 defense in this case?  
 22 MR. FUCHS: Objection to form. If you  
 23 understand his question, do your best to answer.  
 24 THE WITNESS: Say it again. Why  
 25 wouldn't I rely on legal advice or legal -- why

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1 wouldn't I rely on the lawyer? Why wouldn't I?

2 BY MR. DUDLEY:

3 Q I have to ask you that question because

4 you're -- you have filed an answer in this case, and

5 you are asserting that you are relying on advice of

6 counsel. And that's what your attorney has

7 represented to me and the arbitrator in this case.

8 And so what I'm asking you is: What legal

9 advice are you relying on?

10 MR. FUCHS: Objection to form. I think

11 you misstated the defense.

12 But if you know, you can answer.

13 THE WITNESS: I don't know what he's

14 getting at.

15 BY MR. DUDLEY:

16 Q Well, it's not important that you know what

17 I'm getting at. What's important is whether you are

18 relying on anything an attorney told you as a defense

19 in the case. And if you are, I need to know what

20 attorney you're relying on and what the advice was.

21 A In this case?

22 Q In these two arbitrations.

23 MR. FUCHS: Let me place an objection

24 on the record. I don't want you to discuss with

25 Mr. Dudley anything that you and I have talked

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1 about in which I have imparted legal advice to

2 you. Okay? With that objection, you can answer

3 his question if you can.

4 THE WITNESS: In any legal matter, I

5 would rely on my lawyer to give me correct

6 advice. I don't know if that's the question

7 you're asking me or not, but that's my answer.

8 BY MR. DUDLEY:

9 Q Is there a lawyer you're relying on?

10 A What?

11 Q Is there a lawyer whose advice you're

12 relying on? Who is that lawyer?

13 A In this case?

14 Q No. I don't know how much clearer I can put

15 it. You have asserted a good-faith defense in this

16 case. And your attorney has represented in discovery

17 responses that I am not or my client is not entitled

18 to liquidated damages against your clients because you

19 have acted in good faith. And part of that good-faith

20 defense is that you're relying on counsel. And if you

21 are relying on counsel, now is your time to let me

22 know who the counsel was and what the advice was. I'm

23 not going to ask you again. This is the defense in

24 the case.

25 A The counsel would be Dean.

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1 Q You're relying on Dean's advice. Are you

2 relying on any other attorney's advice?

3 A No.

4 Q Okay. And when did Dean give you this

5 advice that you're relying on?

6 A Oh, I don't know.

7 Q You don't know?

8 A No. I am in and out of town all over the

9 place. I don't know. I don't remember last week.

10 Q Can you tell me what the advice was?

11 A No.

12 MR. FUCHS: Objection. Don't answer

13 that question.

14 BY MR. DUDLEY:

15 Q All right. Are you relying on industry

16 custom or practice as part of your good-faith defense

17 in this case?

18 MR. FUCHS: I'm going to object just to

19 the extent you're asking legal -- you're asking

20 her for legal conclusions in terms of what the

21 good-faith defense is.

22 MR. DUDLEY: I'm not.

23 MR. FUCHS: If you understood --

24 MR. DUDLEY: Hang on.

25 MR. FUCHS: I'm not expecting you to

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1 agree with my objection. I'm just stating my

2 objection.

3 If you understood his question, you can

4 answer.

5 THE WITNESS: No. I don't know what --

6 I don't know.

7 BY MR. DUDLEY:

8 Q I'll try to explain this again too. You

9 have asserted a good-faith defense in this case. And

10 your attorney, in discovery responses and in the

11 answer in the case, has said that -- that industry

12 custom is part of that defense, that you're relying on

13 industry custom.

14 But now is your opportunity to tell me

15 whether that's true and, if so, tell me what the

16 custom is you're relying on.

17 MR. FUCHS: Objection to form. If you

18 understood the question, please answer.

19 THE WITNESS: I think you would have to

20 ask somebody else. You're asking me about

21 operations in the club.

22 BY MR. DUDLEY:

23 Q No, I'm not. I'm asking about your defense,

24 not the clubs.

25 A Are you asking me whether or not I think

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1 these girls are independent contractors, if they're  
2 entertainers, if -- are you asking me that? How I  
3 feel about that, is that what you're asking me, my  
4 opinion and how I feel about that?  
5 MR. DUDLEY: Read back my question.  
6 THE WITNESS: I think you're asking me  
7 how I feel about that.  
8 MR. FUCHS: Let her read back the  
9 question, and do the best you can to answer.  
10 (The record was read by the reporter.)  
11 THE WITNESS: Do you want me to tell  
12 you if I'm relying on the custom of the industry  
13 and how entertainers are treated in the industry  
14 across the country?  
15 BY MR. DUDLEY:  
16 Q If you are relying on that.  
17 A And -- and -- and years of practices? Is  
18 that what you're asking me?  
19 Q Well, I'm not going to --  
20 A And how the entertainers want to be treated,  
21 how they -- they want to make their money?  
22 Q Tell me the --  
23 A Is that what you're asking me?  
24 Q -- factual basis of your defense.  
25 A They're entertainers. They're independent

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1 contractors. Just like a comedian you would hire in a  
2 club or a singer you would hire in a club, they're --  
3 and, as a matter of fact, in Las Vegas, they have  
4 business licenses.  
5 Q Well, let's talk about the Georgia folks  
6 we're dealing with.  
7 What is the factual basis of your --  
8 A And I don't know --  
9 Q -- defenses on industry custom?  
10 A I don't know a lot about Atlanta, honestly.  
11 I could tell you more about Vegas than I could tell  
12 you about Atlanta.  
13 Q Tell me --  
14 A I lived there a long time. I haven't been  
15 here that long.  
16 Q Tell me the factual basis of your defense.  
17 A That was --  
18 Q You're saying that they were treated as  
19 independent contractors in the past by custom.  
20 A They're entertainers who come and go as they  
21 please and do what they want and wear what they want  
22 and work when they want.  
23 Q Okay. And you're claiming, for those  
24 reasons, that they --  
25 A And they make a lot of money.

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1 Q And for those reasons, they're independent  
2 contractors. And you were justified in treating them  
3 as independent contractors for those reasons.  
4 A I'm not justifying anything, because I don't  
5 operate the clubs. I'm just giving you my opinion.  
6 Q Well, you're giving me more than your  
7 opinion, because you're a party to this arbitration,  
8 and you've raised this defense on your behalf. So I'm  
9 asking about them.  
10 MR. FUCHS: I think she's just answered  
11 your question.  
12 BY MR. DUDLEY:  
13 Q So you're saying it's industry custom to  
14 classify them as independent contractors; correct?  
15 A As far as I know.  
16 Q Are you relying --  
17 A As far as I know. I'm just relying on what  
18 I know as far as I know.  
19 Q I understand.  
20 A It's what every club does, what every  
21 entertainer wants.  
22 Q Are you relying on any other custom?  
23 A I don't know any other customs.  
24 Q Are you relying on the fact that you think  
25 the entertainer's choice to be treated as an

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1 independent contractor is a defense to the claim? Is  
2 that what you said?  
3 MR. FUCHS: Objection to form. I  
4 didn't hear you. I didn't hear the question. If  
5 you could repeat it, I would appreciate it.  
6 MR. DUDLEY: Would you read it back,  
7 please.  
8 (Discussion off the record.)  
9 BY MR. DUDLEY:  
10 Q Are you contending the fact that the  
11 entertainers want to be employees, according to you?  
12 A No. They don't want to be employees.  
13 Q I'm sorry. The entertainers want to be  
14 independent contractors, according to you? That's  
15 what you're --  
16 A Right.  
17 Q That's what you believe?  
18 A Right.  
19 Q And you think that's a defense to the claim  
20 under the FLSA?  
21 A I don't know if it's a defense or not. I  
22 don't know. Ask my lawyer if it's a defense. I don't  
23 know.  
24 Q Who made the decision to classify the  
25 entertainers in your clubs as independent contractors?

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1 A My father.  
 2 Q Do you know when he made that decision?  
 3 A A long time ago.  
 4 Q Once you inherited your interest in these  
 5 clubs, you made the decision to continue classifying  
 6 these dancers as independent contractors?  
 7 A It's been that way for years. In the past  
 8 couple years, there's a lot of lawyers who solicit  
 9 these entertainers for lawsuits. Wage and hourly is  
 10 the going thing right now. It's the new ambulance to  
 11 chase.  
 12 Q And you made the decision to continue  
 13 classifying --  
 14 A I didn't make any decision. When I took  
 15 over the companies, it was, you know, status quo. I  
 16 thought, you know, my father put good people in good  
 17 positions, and he was a smart man.  
 18 Q Well, you know what happened in Clincy. And  
 19 after Clincy, you decided to continue to --  
 20 A It doesn't mean it was right.  
 21 Q Let me finish. You decided to continue -- I  
 22 know you disagree with Judge Story. But you made the  
 23 decision to continue --  
 24 A I didn't make any decision.  
 25 Q Let me finish my question.

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1 You made the decision to continue  
 2 classifying the entertainers as independent  
 3 contractors.  
 4 A No, I didn't.  
 5 Q All right. Who made that decision?  
 6 A No decision was made one way or the other.  
 7 It just --  
 8 Q You continued to do it.  
 9 A We continued operating the way we'd been  
 10 operating.  
 11 Q And they are independent contractors at  
 12 these clubs up to this day.  
 13 A Yes. As far as I know.  
 14 Q Who made the decision to not pay the minimum  
 15 wage?  
 16 A Oh, they make minimum wage. They make a lot  
 17 of money.  
 18 Q I understand that they make money that  
 19 customers give them.  
 20 But who made the decision on behalf of your  
 21 adult entertain --  
 22 A I don't know.  
 23 Q Let me finish my question.  
 24 A I don't know.  
 25 Q Who made the decision not to pay the

Page 87

1 entertainers the minimum wage?  
 2 MR. FUCHS: Objection to form. If you  
 3 can answer his question --  
 4 THE WITNESS: I don't know.  
 5 BY MR. DUDLEY:  
 6 Q You don't know who, if anyone, made that  
 7 decision?  
 8 A No.  
 9 Q All right. It is a true statement that  
 10 since you have become owner and officer of the adult  
 11 entertainment clubs you own, that these clubs have not  
 12 paid the entertainers minimum wage; correct?  
 13 MR. FUCHS: Objection to form. You can  
 14 do your best to answer his question.  
 15 THE WITNESS: Can you ask me that  
 16 again, please.  
 17 MR. DUDLEY: Read it back, please.  
 18 (The record was read by the reporter.)  
 19 MR. FUCHS: Same objection.  
 20 THE WITNESS: I don't know.  
 21 BY MR. DUDLEY:  
 22 Q You don't know whether you've paid the  
 23 minimum wage?  
 24 A They get paid a lot of money, so I -- we  
 25 don't have to pay -- we -- they -- they get paid a lot

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1 of money. They're independent contractors.  
 2 Q You understand the --  
 3 A They get paid a lot of money.  
 4 Q You understand the minimum wage is seven  
 5 twenty-five an hour?  
 6 A (Witness nods head affirmatively.)  
 7 Q And you --  
 8 A Do you think they make seven twenty-five an  
 9 hour?  
 10 Q And you admit that --  
 11 A Do you think they make twenty-seven --  
 12 MR. FUCHS: Teri --  
 13 THE WITNESS: -- seven twenty-five an  
 14 hour?  
 15 MR. FUCHS: Teri, he doesn't have to  
 16 answer your questions. Let him -- let him ask,  
 17 and you answer. That's the way it works.  
 18 BY MR. DUDLEY:  
 19 Q Can you admit that Goldrush paid none of the  
 20 entertainers who are at issue in this case seven  
 21 twenty-five an hour? Correct?  
 22 MR. FUCHS: Objection to form.  
 23 THE WITNESS: No, I do not admit that.  
 24 BY MR. DUDLEY:  
 25 Q You do not admit that the Pink Pony does not

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1 pay seven twenty-five an hour?  
2 A I don't admit that.  
3 MR. FUCHS: Objection to form.  
4 BY MR. DUDLEY:  
5 Q How much do you contend they pay these  
6 entertainers an hour?  
7 A I'm here as Teri Galardi, and I don't pay  
8 them anything.  
9 Q I understand that. But we're not talking  
10 about what you --  
11 A We are. I'm here as Teri Galardi. That's  
12 who I'm here as; right?  
13 Q You don't live in a vacuum.  
14 A I'm here as Teri Galardi. I don't pay them  
15 anything.  
16 Q I understand that.  
17 A I don't have anything to do with that. I  
18 don't know how it operates there. I honestly don't.  
19 So that's my answer.  
20 Q You understand that the entertainers that  
21 we're here about, they have to pay moneys to Pink Pony  
22 and Goldrush to dance, or employees of Pink Pony or  
23 Goldrush or independent contractors of Pink Pony or  
24 Goldrush; correct?  
25 A Correct.

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1 Q Who made the decision to make these  
2 entertainers pay these amounts?  
3 A My father.  
4 Q Do you know when he made that decision?  
5 A No, I don't.  
6 Q And when you inherited these adult  
7 entertainment clubs, you continued to adhere to that  
8 policy; right?  
9 A I don't even -- I don't know what's paid. I  
10 don't know what's not paid. Honestly, I don't.  
11 You're asking me stuff that I really don't know about.  
12 Q Do you contend that these entertainers were  
13 paid a service charge by Pink Pony or Goldrush?  
14 A They were paid a service charge? I don't  
15 know about any service charge that the club paid or I  
16 paid or anybody paid. I don't know about any service  
17 charge.  
18 Q You understand that entertainers at the Pink  
19 Pony and Goldrush are required to sign written  
20 independent contractor agreements?  
21 A I guess they would probably all sign an  
22 independent contractor agreement.  
23 Q Who made the decision to use these written  
24 independent contractor agreements?  
25 A My father.

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1 Q And when you became the owner of these  
2 clubs, did you continue that policy?  
3 A I guess I did. I didn't, you know, change  
4 anything that he did.  
5 Q And despite all these lawsuits, you just  
6 continued to use an independent contractor agreement  
7 and classify these entertainers --  
8 A If they want to be --  
9 Q -- as independent contractors?  
10 A If they want to be considered as employees,  
11 they can. And none of them do.  
12 Q Has that ever happened?  
13 A Yeah. Has it happened that they want to be  
14 employees?  
15 Q Yes.  
16 A No. They don't want to be employees.  
17 Q Pink Pony and Goldrush utilize arbitration  
18 agreements?  
19 A Yes.  
20 Q And the decision was made to use these  
21 arbitration agreements to avoid collective and class  
22 actions under the FLSA?  
23 MR. FUCHS: Objection to form. If you  
24 know, you can answer.  
25 THE WITNESS: I don't know.

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1 BY MR. DUDLEY:  
2 Q Well, I think you've testified to that  
3 before, have you not?  
4 A Well, I testified that we would -- we're not  
5 saying that anybody can't have a disagreement with us,  
6 but we will deal with disagreements on an individual  
7 basis. That's probably what I testified for.  
8 THE WITNESS: Excuse me. I need to use  
9 the restroom.  
10 MR. FUCHS: Sure. Do you want to take  
11 a break?  
12 MR. DUDLEY: Sure.  
13 (Brief pause in the proceedings.)  
14 BY MR. DUDLEY:  
15 Q My question to you is whether your company  
16 started using arbitration agreements to avoid FLSA  
17 class or collective actions.  
18 A Well, we haven't done a very good job of  
19 avoiding them, have we?  
20 Q Some may argue with that, but --  
21 A I don't think that that -- it has avoided  
22 that, so --  
23 Q But that was the reason they were  
24 instituted?  
25 A The reason was we wanted to deal with --

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1 we're not saying you can't have a dispute. We're just  
2 saying, "Come to us, and we'll deal with the dispute."  
3 Q And you made the decision to require  
4 entertainers at clubs you own to sign arbitration  
5 agreements?  
6 A I didn't personally make that decision.  
7 Q Let me turn back to that deposition you had  
8 with Mr. Miller back on April the 25th, 2015.  
9 He asked you: Who was it that made the  
10 decision to require entertainers at all the clubs to  
11 sign arbitration agreements?  
12 And your response was: Well, it was  
13 something that Dennis and I talked about kind of early  
14 on --  
15 A You're asking me --  
16 Q Let me finish -- just because there were so  
17 many class action suits. And my feeling was, you  
18 know -- and we weighed the pros and cons. But my  
19 feeling was I didn't care if somebody had a beef with  
20 me or our company specifically. I just wanted to deal  
21 with that on a case-by-case basis.  
22 Was that your response?  
23 A Yes, that was my response. But you're  
24 asking me today as Teri Galardi personally, not as --  
25 Q I don't understand how that has a bearing

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1 on --  
2 A Well, I'm not --  
3 Q -- the truthfulness of your answer to that  
4 question.  
5 A I'm not -- I'm not answering you as a  
6 corporate representative. I'm answering you  
7 personally.  
8 Q You're going to have to explain that to me,  
9 because I don't understand why your answer would be  
10 different.  
11 A Well, it's pretty simple. I'm here today as  
12 Teri Galardi, not as president of a corporation, not  
13 as a representative of a corporation. I'm here as  
14 Teri Galardi.  
15 Q So is your answer different because this is  
16 individual testimony?  
17 A Yes, it is different.  
18 Q How so?  
19 A Well, as Teri Galardi, Teri Galardi is an  
20 individual person, me.  
21 Q How --  
22 A If you want me to answer for the company,  
23 that's a different thing. But I'm not -- I'm not a  
24 representative of the company.  
25 Q Well, that's a matter that the Courts will

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1 decide.  
2 A Okay.  
3 Q And, again, you were asked: In any event,  
4 the decision to move forward with arbitration  
5 agreements was one that was made by you, meaning  
6 you --  
7 A Well, you can read it from there. You  
8 already read the answer.  
9 Q Let me finish my question.  
10 In any event, the decision to move forward  
11 with arbitration agreements was one that was made by  
12 you, meaning Teri Galardi and Dennis Williams,  
13 whenever -- irrespective of whenever it was  
14 implemented; is that right?  
15 A Well --  
16 Q And your response was: That's right.  
17 Was that true when you answered that  
18 question?  
19 A To Harlan Miller?  
20 Q Yes.  
21 A Yes.  
22 Q Do you know who authored the arbitration  
23 agreement?  
24 A No.  
25 Q Was it prepared by an attorney?

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1 A I don't know. I would hope so.  
2 Q You don't know which attorney?  
3 A No.  
4 Q Do you know who prepared your independent  
5 contractor agreement?  
6 A No.  
7 Q And you made the decision to use the  
8 arbitration agreements at all the clubs; correct?  
9 MR. FUCHS: Haven't we answered this  
10 question already?  
11 THE WITNESS: I did not personally make  
12 that decision.  
13 BY MR. DUDLEY:  
14 Q The decision to give entertainers the choice  
15 between becoming an employee or an independent  
16 contractor was a decision that was made after you  
17 became the owner; correct?  
18 A Yes.  
19 Q That was a decision you made?  
20 A Personally, no.  
21 Q Were you involved in the decision?  
22 A Personally, no.  
23 Q You have the power to make that decision,  
24 though?  
25 A If I want to.

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1 Q The fact of the matter is you have the power  
 2 to make any decision, okay, regarding classification,  
 3 compensation, how tip-outs are handled, whether  
 4 something is a service charge or not, what records the  
 5 company keeps, and the type of agreements they use  
 6 with the people that work for them; correct?  
 7 A I would --  
 8 MR. FUCHS: Objection to form. You can  
 9 answer.  
 10 THE WITNESS: I would not do that.  
 11 BY MR. DUDLEY:  
 12 Q I didn't ask you that. Do you have the  
 13 power to do that?  
 14 A I understand that. But I would not do that.  
 15 I don't operate the clubs. I don't go in the clubs.  
 16 I would not go throwing my weight around like that.  
 17 Q You have the power to do that; correct?  
 18 A Well, as the owner and the president of  
 19 these corporations, I suppose I would. It is nothing  
 20 that I would do, ever.  
 21 Q Is the answer yes, you have the power, but  
 22 you haven't exercise it?  
 23 A I would not exercise it. That's my answer.  
 24 Q Do you have the power?  
 25 A And you're -- this is something that's

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1 either true or not true as far as an owner goes;  
 2 correct?  
 3 Q Well, that's what I'm asking you. What is  
 4 your understanding?  
 5 A I know what you're asking me, but I don't do  
 6 that.  
 7 Q Your understanding is because you're the  
 8 owner, you have the power to do that.  
 9 A I would not do that. These were my father's  
 10 businesses that ran long before I -- I wasn't even  
 11 involved with my father's businesses. I wouldn't do  
 12 that.  
 13 Q Do you have the power --  
 14 A I inherited this.  
 15 Q And it's now yours, and it has been since  
 16 your father passed away; right?  
 17 A I'm going to say I don't have the power.  
 18 How about that?  
 19 Q Well, I expect you give a truthful answer --  
 20 A It is a truthful answer, because I wouldn't  
 21 go over anybody like that.  
 22 Q Who has the power to make legal decisions  
 23 regarding the claims we've discussed in this  
 24 deposition today?  
 25 MR. FUCHS: Objection to form. If you

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1 understood the question, you can answer.  
 2 THE WITNESS: I don't know.  
 3 BY MR. DUDLEY:  
 4 Q You don't know who has the power?  
 5 A Huh-uh (negative).  
 6 Q Do you have the power?  
 7 A To make legal decisions?  
 8 Q Regarding the claims we discussed in this  
 9 deposition.  
 10 A I'm here as Teri Galardi, so I'm here  
 11 personally.  
 12 Q As owner, do you have the power --  
 13 A I'm not being deposed as the owner.  
 14 Q As owner --  
 15 A I'm being deposed as Teri Galardi.  
 16 MR. FUCHS: Listen to his question.  
 17 MR. DUDLEY: Ms. Galardi, please let me  
 18 finish my question.  
 19 BY MR. DUDLEY:  
 20 Q As owner, do you have the power to make  
 21 legal decisions regarding the clubs you own?  
 22 A Yes.  
 23 Q Have you delegated that authority to anyone  
 24 other than yourself?  
 25 A No.

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1 Q Do you understand that you have brought  
 2 counterclaims against the entertainers that have  
 3 brought these actions?  
 4 MR. FUCHS: Objection to form.  
 5 THE WITNESS: I don't know what you're  
 6 talking about. What counterclaims?  
 7 BY MR. DUDLEY:  
 8 Q Are you aware of any counterclaims you  
 9 brought in this case?  
 10 A Against entertainers?  
 11 Q Yes.  
 12 A I don't know.  
 13 Q Are you aware of Goldrush or Pink Pony  
 14 bringing any counterclaims in the case?  
 15 A Not aware.  
 16 Q Do you know what those counterclaims --  
 17 A I'm not aware of any.  
 18 Q Okay. You are aware that the clubs you own  
 19 have brought counterclaims against entertainers  
 20 before?  
 21 A I don't know. I don't know that. So I  
 22 guess power may have been delegated to someone before  
 23 I came along; right?  
 24 Q The counter --  
 25 A To make the legal decisions, I mean, because

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1 I don't know about it.  
2 Q You don't know about counterclaims?  
3 A I don't know of -- I'm not aware of any. I  
4 don't know.  
5 MR. DUDLEY: I think we're probably  
6 through. Let me speak with co-counsel for one  
7 second.  
8 MR. FUCHS: Sure.  
9 (Brief pause in the proceedings.)  
10 MR. DUDLEY: I don't have anything,  
11 unless you guys do.  
12 MR. FUCHS: I have just a few.  
13 MR. DUDLEY: Okay.  
14 EXAMINATION  
15 BY MR. FUCHS:  
16 Q Ms. Galardi, Ms. -- Mr. Dudley -- excuse  
17 me -- asked you about your job responsibilities. My  
18 question is in that same vein.  
19 In your own words, could you describe what  
20 you consider your primary job responsibilities to be.  
21 A Now, grandmother, mother, grandmother.  
22 Q And do you travel quite a bit?  
23 A I travel a lot. I have grandchildren in  
24 three states. As a matter of fact, I'm going to a  
25 birthday party for my grandson, who's going to be

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1 three. And we just did a Disney World trip with -- I  
2 brought all the grandchildren together, other family  
3 members.  
4 Q Terrific. How often would you say you visit  
5 any of the clubs, the adult clubs that you own?  
6 A Almost never.  
7 Q In the roughly four and a half years that  
8 you've owned the clubs that your father previously  
9 owned, can you tell me -- can give me an approximate  
10 guess -- excuse me -- an approximation as to how many  
11 times you've been to Goldrush?  
12 A Twice.  
13 Q And in the same four and a half years since  
14 you've owned the clubs, can you tell me the  
15 approximate number of times you've been to the Pink  
16 Pony?  
17 A Probably three or four times, maybe five, to  
18 look at the bathrooms.  
19 Q How frequently do you converse, speak, with  
20 Mike Kap about operational matters?  
21 A Probably once every other week.  
22 Q Same question with respect to Dennis  
23 Williams.  
24 A Probably twice a week, sometimes less if I'm  
25 not here.

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1 MR. FUCHS: That's all I have.  
2 MR. DUDLEY: I don't have anything.  
3 MR. FUCHS: Okay. Is the witness  
4 excused?  
5 MR. DUDLEY: Yes. Thank you.  
6 (It was agreed that the witness will reserve  
7 signature.)  
8 (Deposition concluded at 12:58 p.m.)  
9 ---  
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1 DISCLOSURE  
2 STATE OF GEORGIA  
3 COUNTY OF CHEROKEE  
4 DEPOSITION OF: TERI GALE GALARDI  
5 Pursuant to Article 8.B of the Rules and  
6 Regulations of the Board of Court Reporting of the  
7 Judicial Council of Georgia, I make the following  
8 disclosure:  
9 I am a Georgia Certified Court Reporter. I  
10 am here as an independent contractor for American  
11 Court Reporting Company, Inc.  
12 The firm was contracted by the offices of  
13 Ainsworth G. Dudley, Esq., to provide court reporting  
14 services for this deposition. The firm will not be  
15 taking this deposition under any contract that is  
16 prohibited by O.C.G.A. 15-14-37(a) and (b).  
17 Option A: The firm has no contract/agreement to  
18 provide reporting services with any party to the case,  
19 any counsel in the case, or any reporter or reporting  
20 agency from whom a referral might have been made to  
21 cover this deposition. The firm will charge its usual  
22 and customary rates to all parties in the case, and a  
23 financial discount will not be given to any party to  
24 this litigation.  
25 (Signature of Attorneys optional.)  
19 AUDREY MICHELLE LING, CCR-B-1752 March 29, 2017  
20  
21  
22 Attorney for Plaintiff Date:  
23  
24 Attorney for Defendant Date:  
25

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1 C E R T I F I C A T E

2 STATE OF GEORGIA )

3 COUNTY OF CHEROKEE )

4 I hereby certify that the foregoing  
5 transcript was taken down, as stated in the  
6 caption, and the proceedings were reduced to  
7 typewriting under my direction and control.

8 I further certify that the transcript is a  
9 true and correct record of the evidence given at  
10 the said proceedings.

11 I further certify that I am neither a  
12 relative nor employee nor attorney nor counsel to  
13 any of the parties, nor financially or otherwise  
14 interested in this matter.

15 This the 18th day of April 2017.

16

17

18

19

20

21

22

23 AUDREY MICHELLE LING, CCR-B-1752

24

25

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1 E R R A T A S H E E T

2 IN RE: BECTON, et al., v. COUNTRY CLUB, INC., et al.;

3 ROBERTS, et al., v. TROP, INC., et al.

4 NO: N/A

5 DEPOSITION TAKEN ON: March 29, 2017

6 I have read the transcript of my deposition and find  
7 that no changes are necessary \_\_\_\_\_.

8 Having read the transcript of my deposition, I wish to  
9 make the following changes: (Please state reason.)

9 Page \_\_\_\_\_, Line \_\_\_\_\_:

10 Page \_\_\_\_\_, Line \_\_\_\_\_:

11 Page \_\_\_\_\_, Line \_\_\_\_\_:

12

13

14

15

16

17

18

19 \_\_\_\_\_, TERI GALE GALARDI

20 Sworn to and subscribed before me, this the \_\_\_\_ day

21 of \_\_\_\_\_, 2017; \_\_\_\_\_

22 County, Georgia.

23

24 \_\_\_\_\_, Notary Public

25 My commission expires: \_\_\_\_\_

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